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February 13, 2015

VIA ECF & FACSIMILE (609) 989-0451

The Honorable Douglas E. Arpert, U.S.M.J.
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

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FEB 1 / 2015

DOUGLAS E. ARPERT
U.S. MAGISTRATE JUDGE

Re: Helsinn Healthcare S.A., et. al. v. Dr. Reddy's Laboratories, Ltd., et al.
Civil Action No. 11-3962 (MLC)(DEA)

Dear Judge Arpert:

This firm, together with Paul Hastings LLP and Loeb & Loeb LLP, represents Plaintiffs Helsinn Healthcare S.A. and Roche Palo Alto LLC ("Plaintiffs") in the above-captioned matter.

As discussed at the conference with Your Honor this past Wednesday, February 11, enclosed is a proposed amended case schedule to which the parties have agreed. If this meets with the Your Honor's approval, we respectfully request that Your Honor sign the below form of endorsement and enter the schedule on the docket.

Thank you for Your Honor's kind attention to this matter.

Respectfully yours,

Charles M. Lizza

cc: All Counsel (via e-mail)

SO ORDERED on this 17th day of February, 2015.

Hon. Douglas E. Arpert, U.S.M.J.

Helsinn et al. v. Dr. Reddy's Labs. et al. (D.N.J.)
Proposed Consolidated 11-03962 / 13-05815 Schedule

Revised

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Event	Current Schedule	Proposed Schedule
Deposition of Dr. DeLuca		February 10, 2015 (Completed)
Deposition of Dr. Candiotti		February 13, 2015
Deposition of Dr. Kirsch		February 26, 2015
Exchange list of legal issues	January 14, 2015	Completed
Exchange fact witness lists (aside from those witnesses called for impeachment purposes, only the witnesses set forth may testify at trial)	January 21, 2015	Completed
Exchange expert witness lists (no expert shall be permitted to testify at trial unless identified at this time)	January 21, 2015	Completed
Exchange objections to fact and expert witness lists	February 4, 2015	February 27, 2015
Exchange exhibit lists	February 25, 2015	March 18, 2015
Exchange electronic collection of exhibits from parties' respective exhibit lists in a mutually acceptable format	March 3, 2015	March 24, 2015
Exchange objections to the opposing party's exhibit list	March 18, 2015	April 8, 2015
Exchange affirmative deposition designations	February 4, 2015	March 2, 2015
Exchange deposition counter-designations and objections to affirmative designations	February 25, 2015	March 25, 2015
Exchange objections to counter designations	March 11, 2015	April 8, 2015
Exchange stipulation of facts for the issues on which the parties have the burden of proof	February 4, 2015	February 25, 2015
Exchange responses to stipulation of facts	March 3, 2015	March 24, 2015
Exchange contested facts	March 20, 2015	April 10, 2015
Exchange lists of the parties' contemplated motions <i>in limine</i>	January 23, 2015	Completed
Meet and confer in an attempt to reach mutual resolutions regarding the parties' contemplated motions <i>in limine</i>	January 30, 2015	March 2, 2015
Serve opening motions <i>in limine</i>	February 27, 2015	March 24, 2015
Serve responses to motions <i>in limine</i>	March 20, 2015	April 14, 2015
Plaintiffs serve draft Pretrial Order text	March 11, 2015	April 1, 2015
Defendants serve rebuttal to Plaintiff's draft Pretrial Order text	March 18, 2015	April 10, 2015
Proposed Final Pretrial Order Due	March 25, 2015	April 17, 2015

Helsinn et al. v. Dr. Reddy's Labs. et al. (D.N.J.)
Proposed Consolidated 11-03962 / 13-05815 Schedule

Event	Current Schedule	Proposed Schedule
Final Pretrial Conference	April 8, 2015 at 10:30 am	April 29, 2015 at 2 pm
Trial Briefs and Proposed Findings of Facts and Conclusions of Law	Two weeks before trial	May 19, 2015
Trial	Subject to Court's availability; consistent with an April/May 2015 trial date	June 2, 2015